

## Mars Khaim ov Law, PLLC

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VIA ECF

July 14, 2021

Hon. Judge Sidney H. Stein United States District Judge Southern District of New York 40 Centre Street New York, NY 10007

MEMO ENDORSED

Re: Paguada v. American Retail Supply Corp.: Case No: 1:21-cv-00733-SHS

To the Honorable Judge Stein,

The undersigned represents Plaintiff Dilenia Paguada (hereinafter "Plaintiff") in the above-referenced matter.

This Letter is submitted in response to the Court's April 15, 2021, Order directing Plaintiff to move for a default judgment by May 21, 2021.

By way of background, this matter has been pending before the Court since January 27, 2021, and while Defendant was properly served (and Affidavit of Service filed on the docket), Defendant failed to appear or otherwise respond.

Plaintiff is in the process of obtaining a Certificate of Default from the Clerk of the Court and will promptly be filing an Motion for Default Judgement in accordance with the Court's Individual Rules.

As such, Plaintiff is requesting 15 days in which to attempt to contact Defendant or in the alternative, move for Default Judgment.

Counsel for Plaintiff apologizes for the delay in requesting an extension and is determined to respond to all Orders moving forward in a timely manner.

Thank you for the consideration of Plaintiff's request.

The last day to serve and file a motion for a default judgment is extended to July 30, 2021.

Yours sincerely,

/s/Mars Khaimov

Dated: New York, New York July 14, 2021 SO ORDERED

Sidney H. Stein, U.S.D.J.